

RICHARD B. GULLEN (SBN 144513)
ROSSI, HAMERSLOUGH, REISCHL & CHUCK
1960 The Alameda, Suite 200
San Jose, CA 95126-1493
Tel: (408) 261-4252
Fax: (408) 261-4292
Email: rick@rhrc.net

Attorneys for Movants,
XIAOTIAN SUN and WEI LUO

Gordon J. Finwall (SBN 141777)
FINWALL LAW OFFICES, APC
1056 Lincoln Avenue
San Jose, CA 95125
Tel: (408) 350-4041
Fax: (408) 350-4042
Email: Gordon@Finwalllaw.com

Attorneys for Movants,
CSABA MESTER and MARTA MESTER

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In Re:

PG&E CORPORATION,

And

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

Affects both Debtors.

Bankruptcy Case No. 19-30088 (DM)

DC NO.: RG-1

Chapter 11

(Lead Case)

(Jointly Administered)

DECLARATION OF RICHARD B. GULLEN IN SUPPORT OF JOINT MOTION FOR RELIEF FROM AUTOMATIC STAY

XIAOTIANSUN and WEI LUO, and
CSABA WENDEL MESTER and MARTA M.
MESTER individually and as trustees of the
CSABA & MARTA MESTER FAMILY
REVOCABLE LIVING TRUST DATED
9/1/2011 and any amendments thereto,

Movants,

Date: July 31, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
450 Golden Gate Avenue
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 vs.

2 PG&E CORPORATION, PACIFIC GAS AND
3 ELECTRIC COMPANY, Debtors,

4 Respondents.
5

6 I, RICHARD B. GULLEN, declare as follows:

7 1. I am attorney duly licensed to practice law in the State of California, and the
8 attorney for Xiaotian Sun and Wei Luo (the "Suns" herein). I have personal knowledge of the
9 facts stated herein, and if called as a witness could competently testify thereto.

10 2. I submit this declaration in support of the motion for relief from automatic stay
11 filed jointly by the Suns and Csaba Wendel Mester and Marta M. Mester, individually and as
12 trustees of the Csaba & Marta Mester Family Revocable Living Trust Dated 9/1/2011 and any
13 amendments thereto.

14 3. Attached as **Exhibit "A"** is a copy of the Suns' First Amended Complaint filed in
15 the State Court Action.

16 4. Attached as **Exhibit "B"** is a copy of the Mesters' Cross-Complaint filed in the
17 State Court Action.

18 5. Attached as **Exhibit "C"** is a copy of the stipulation executed by counsel for the
19 Suns and the Mesters granting leave to the Suns to file the proposed Second Amended
20 Complaint, a copy of which is attached the stipulation.

21 6. Attached as **Exhibit "D"** is a copy of the cover letter dated July 15, 2019 and
22 proposed stipulation and order for relief from automatic stay forwarded to Debtors' counsel prior
23 to the filing of this Motion. At the time of the filing of this Motion, no response has been
24 received from Debtors' counsel to the proposed stipulation.

25 7. The State Court Action was scheduled to begin trial on April 29, 2019. Due to the
26 Debtors' bankruptcy, on March 29, 2019, the Court in the State Court Action vacated the trial
27 date and set the State Court Action for a trial setting conference on July 23, 2019.

28 I declare under penalty of perjury under the laws of the State of California that the
Case No. 19-30088 (DM) - Declaration of Richard B. Gullen In Support of Joint Motion for Relief from Auto Stay 2

1 foregoing is true and correct.

2 Executed this 17th day of July, 2019, at San Jose, California.

3 By: /s/ Richard B. Gullen
4 RICHARD B. GULLEN